

**FILED**

1 Terese Mary Harding (Defendant in Pro Per)  
2 4620 Debralee Way  
3 Sacramento, CA 95838 Telephone (916) 807-9292

DEC 13 2023

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY \_\_\_\_\_

DEPUTY CLERK

4 **UNITED STATES DISTRICT COURT**  
5 **EASTERN DISTRICT OF CALIFORNIA**

6 Plaintiff: DAMIAN EARLY ) Case NO.: 2:23-CV-02405-DJC-JDP

)

7 ) Answer

)

8 V. )

)

9 Defendant: Terese Mary Harding )

)

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11 )

12 NOW COMES DEFENDANT, who's true and correct name is Terese Mary Harding, who  
13 files this Answer to the Unverified and Frivolous and Predatory Complaint and  
14 Affirmative Defenses to Plaintiff's unverified, false and unfounded  
15 allegations, complaint and states the following:

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17 As a first, separate and distinct affirmative defense to the plaintiff's  
18 complaint and each cause of action therein, Defendant hereby denies, each of  
19 all of the allegations contained in the Complaint and denies that the  
20 Plaintiff is entitled to any relief against this answering defendant.

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22 As a second, separate and distinct affirmative defense to the Plaintiff's  
23 complaint and each cause of action therein, this Defendant denies ever  
24 meeting, speaking with, knowing or doing any business with the Plaintiff.

1 As a third, separate and distinct affirmative defense to this complaint, the  
2 Plaintiff has not provided and or produced any evidence; copies, witnesses,  
3 testimonies, statements, recordings, receipts, memos, faxes, exhibits,  
4 agreements and or any proof whatsoever to justify this predatory and  
5 frivolous complaint.

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7 As a fourth, separate and distinct affirmative defense to the plaintiff's  
8 complaint and each cause of action therein, Defendant alleges that the  
9 Plaintiff is barred from asserting any causes of action against answering  
10 Defendant by the doctrine of waiver.

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12 As a fifth, separate and distinct affirmative defense to the plaintiff's  
13 complaint and each cause of action therein, defendant alleges the Plaintiff  
14 is barred from asserting any causes of action against this answering  
15 Defendant by the doctrine of unclean hands.

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17 As a sixth, separate and distinct affirmative defense to the plaintiff's  
18 complaint and each cause of action therein, Defendant alleges that Plaintiff  
19 lacks standing to sue in this action. This answering Defendant respectfully  
20 requests that this Court dismiss the Plaintiff's complaint with prejudice.

1 **Wherefore this Defendant prays that Plaintiff and or attorney receive nothing**  
2 **and that the defendant recovers her costs for answering this complaint and or**  
3 **any other relief the Court deems proper and just.**

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5 Respectfully signed and submitted on this 12<sup>th</sup> day of December 2023.

6 *Terese M*  
7 *Harding*  
By: **Terese Mary Harding**, Defendant in Pro Per

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2 Proof of Service - Civil  
3

4 Case No: 2:23-CV-02405-DJC-JDP  
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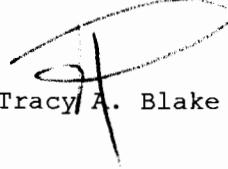
6 At the time of service, I was over the age of 18; My Address is 8066 Sunset  
7 Ave Suite 102 Fair Oaks, CA 95628, which is located in Sacramento County,  
8 where this mailing occurred on December 12, 2023, I served the **answer** to the  
9 complaint to:

10  
11 **Vodonick Law, Attorney for plaintiff**

12 **P.O. Box 763 Nevada City, CA 95959**

13  
14 The documents were served by the following method(s): By U.S. First Class  
15 Mail - I deposited the sealed envelope with the U.S. Postal Service, with  
16 postage fully prepaid.

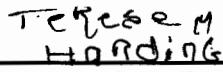
17  
18 I declare under penalty of perjury under the laws of this State of  
19 California that the foregoing is true and correct, executed on  
20 December 12, 2023

21  
22   
23 By: Tracy A. Blake  
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## **VERIFICATION**

I **Terese Mary Harding**, am a party to this matter [case # 2:23-CV-02405-DJC-JDP]. I have read the foregoing Answer and know the contents thereof to be true and correct to my own personal knowledge, except as to those matters stated therein upon information and belief, in which case I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct and that this verification was executed on the 12<sup>th</sup> day of December 2023, at Sacramento, CA.

  
Terese Mary Harding